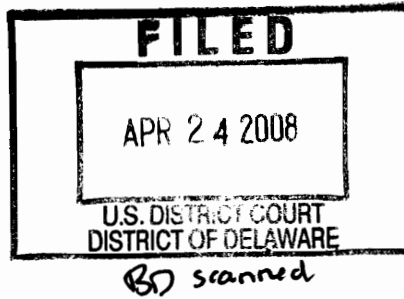


In the U.S. District Court for the District of Delaware

Xianhua Zhang
Plaintiff

vs.

ING Direct
Defendant



Case No. 07-555

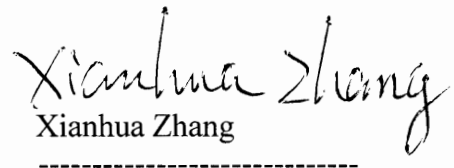
Jury Trial Demanded

**Plaintiff's Responses to Request for
Production of Document Set One from Defendant**

1. Three performance reviews for Plaintiff by Kelley Yohe, Defendant's Team Lead Database Services; job offer letter; job description for Database Support Engineer III – Oracle (Database Administrator); ING Direct Standard Employment Terms and Conditions; ING Direct 401(K) and PS Plan; two emails I sent to Naomi Seramone HR Defendant and Employee+Handbook+2005-06.15. Evidences in Complaint, Plaintiff's Pleading to Defendant ING Direct's Affirmative Defenses, Plaintiff's Request for Production of Documents Addressed to Defendant and Plaintiff's Interrogatories Directed to Defendant and Plaintiff's Responses to Interrogatories Set One from Defendant.
2. Same as No. 1.
3. Same as No. 1.
4. Same as No. 1.
5. Offer letter. Evidences in Complaint, Plaintiff's Pleading to Defendant ING Direct's Affirmative Defenses, Plaintiff's Request for Production of Documents Addressed to Defendant and Plaintiff's Interrogatories Directed to Defendant.
6. Same as No. 1.
7. I am now still receiving treatment to cure my serious impairments caused by traffic accident on 1/24/2003. Since Defendant is asking for Plaintiff's authorization to release all medical records related to this accident and Plaintiff is going to provide such authorization, there is no need for duplicate efforts to send those records.
8. Same as No. 7.
9. Same as No. 7.
10. Objection. This request exceeds the scope of permissible discovery related to this case as being broad, unreasonable, burdensome and unduly oppressive. Nevertheless, I did get \$7472 of unemployment compensation after 8/16/05 and before I started to work for CDI as DBA-Oracle since the end of 11/05. This is a consultant job with hourly rate of \$53 without any benefits.

11. Objection. This request exceeds the scope of permissible discovery related to this case as being broad, unreasonable, burdensome and unduly oppressive.
12. I have been working with CDI as DBA-Oracle since the end of 11/05. It is a normal and high level Oracle DBA job requiring many years of extensive Oracle database administration experience to manage complicated Oracle databases but no perl experience required like all other Oracle DBA jobs.
13. Same as No. 1.
14. Same as No. 1.
15. Same as No. 1.
16. Same as No. 5.
17. Same as No. 5. Monetary harm of \$61079 that includes the following items calculated based on my annual salary \$85000 and benefits: Bonus equal to 18% of salary for 4.25 months is \$5418. Eight day of PTO pay is \$2720. Four hours of business time off is \$170. Profit sharing equal to 2% of salary is \$602. ING Direct also kept many of my personal belongings such as staples, tape, pens (ING Direct does not provide any office supplies.) and many technical printings that I brought from home with value about \$40. In addition, the salary for my unemployment period of 3.5 months with benefits – 18% bonus, 2% profit sharing and 7 days of PTO equal to \$32129 plus cost of \$20000 for health insurance from 9/05 up to now. Besides, the unlawful discharge was also a heavy blow to me mentally. The value of that loss and cost of health insurance for the future eight years will be decided by Judge and Jury during the trial.
18. Same as No. 1.
19. Same as No. 1.
20. Same as No. 1.
21. Objection. This request exceeds the scope of permissible discovery as it seeks information and documents protected by attorney client privilege.
22. Objection. This request exceeds the scope of permissible discovery related to this case as being broad, unreasonable, burdensome and unduly oppressive.
23. Objection. This request exceeds the scope of permissible discovery related to this case as being broad, unreasonable, burdensome and unduly oppressive.
24. Same as No. 1.
25. Same as No. 1.

26. Same as No. 1.
27. Same as No. 1.
28. Same as No. 1.
29. Same as No. 1.
30. Same as No. 1.
31. Same as No. 1.
32. Same as No. 1.
33. Same as No. 1.
34. Same as No. 1.
35. Same as No. 1.
36. Evidences in Complaint, Plaintiff's Pleading to Defendant ING Direct's Affirmative Defenses, Plaintiff's Request for Production of Documents Addressed to Defendant and Plaintiff's Interrogatories Directed to Defendant and Plaintiff's Responses to Interrogatories Set One from Defendant.
37. Same as No. 1.
38. Same as No. 1.
39. Same as No. 1.
40. Same as No. 1.
41. Answers to interrogatories 10, 13 and 14. See reply to Request No. 7. Evidences in Complaint, Plaintiff's Pleading to Defendant ING Direct's Affirmative Defenses, Plaintiff's Request for Production of Documents Addressed to Defendant and Plaintiff's Interrogatories Directed to Defendant and Plaintiff's Responses to Interrogatories Set One from Defendant.


Xianhua Zhang

Plaintiff


Date: 4/9/2008

CERTIFICATE OF SERVICE

I, Xianhua Zhang, hereby certify that a true and correct copy of Plaintiff's Responses to Request for Production of Document Set One from Defendant has been electronically and timely mailed upon the following:

David P. Primack David.Primack@dbr.com – Attorney for Defendant
David J. Woolf David.Woolf@dbr.com – Attorney for Defendant
Edward N. Yost Edward.Yost@dbr.com – Attorney for Defendant

Date: 4/9/2008


Xianhua Zhang

Plaintiff